

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankr. No. 25-20026 CMB
JOHN D. NAPPER,)	
)	Chapter 13
Debtor.)	
)	Docket No. 21
KEY BANK,)	Related to Docket No. 18
)	
Movant,)	Hearing Date & Time:
)	
vs.)	Claim No.
)	
JOHN D. NAPPER AND)	
RONDA J. WINNECOUR,)	
CHAPTER 13 TRUSTEE,)	
Respondents.)	

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, John D. Napper, by and through his attorney, who respectfully represents the following:

1. On or about January 5, 2025, Debtor converted his case under Chapter 7 to a case under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Key Bank has filed a Notice of Mortgage Payment Change.
(a) The monthly mortgage payment of **\$130.78** is being **decreased** to **\$126.11** effective **3/15/2025**.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment according to the above referenced Notice of Mortgage Payment Change commencing with the next distribution in the effective amount

Date: 3/4/2025

Respectfully submitted.

/s/ Rodney D. Shepherd

Rodney D. Shepherd, Esquire

Attorney for the Debtor

PA I.D. No. 56914

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CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 4th day of March, 2025, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

Key Bank
Attn: Brent J. Lemon, Esquire
blemon@kmlawgroup.com

By: /s/ Rodney D. Shepherd
Rodney D. Shepherd
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